

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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AMPEX CORPORATION,

*Plaintiff,*

v.

EASTMAN KODAK COMPANY,  
ALTEK CORPORATION, and  
CHINON INDUSTRIES, INC.,

*Defendants.*

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) C.A. No. 04-1373 (KAJ)  
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)

) **PUBLIC VERSION**  
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**SUPPLEMENTAL DECLARATION OF KAREN A. CHRISTIANSEN  
IN SUPPORT OF AMPEX CORPORATION'S REPLY BRIEF IN SUPPORT  
OF ITS MOTION FOR PARTIAL SUMMARY JUDGMENT THAT  
U.S. PATENT NO. 4,821,121 IS NOT ANTICIPATED**

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Original Filing Date: June 20, 2006

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C.A. No. 04-1373-KAJ

**CONFIDENTIAL  
FILED UNDER SEAL**

**SUPPLEMENTAL DECLARATION OF KAREN A. CHRISTIANSEN  
IN SUPPORT OF AMPEX CORPORATION'S REPLY BRIEF IN SUPPORT  
OF ITS MOTION FOR PARTIAL SUMMARY JUDGMENT THAT  
U.S. PATENT NO. 4,821,121 IS NOT ANTICIPATED**

I am an associate with the law firm of Ropes & Gray LLP, attorneys for plaintiff Ampex Corporation ("Ampex") in this action. I make this declaration in support of Ampex Corporation's Reply Brief in Support of Its Motion for Partial Summary Judgment that U.S. Patent No. 4,821,121 Is Not Anticipated.

1. Attached hereto as Exhibit 18 are true and correct copies of selected pages from the Disclosure of Expert Rebuttal Testimony of Alan Cavallerano, submitted in this action on April 11, 2006.

2. Attached hereto as Exhibit 19 are true and correct copies of selected pages from the Deposition of Richard J. Taylor, taken in the ITC action on June 6, 2005.

3. Attached hereto as Exhibit 20 are true and correct copies of selected pages from the Deposition of Richard J. Taylor, taken in this action on April 28, 2006.


4. Attached hereto as Exhibit 21 are true and correct copies of selected pages from the Deposition of Junaid Sheikh, taken in the ITC action on May 6, 2005.

5. Attached hereto as Exhibit 22 are true and correct copies of selected pages from the Deposition of Dieter W. Preuss, PhD, taken in this action on May 5, 2006.

6. Attached hereto as Exhibit 23 is a true and correct copy of U.S. Patent No. 4,302,776, granted November 24, 1981.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 20, 2006 in Palo Alto, California.

  
\_\_\_\_\_  
Karen A. Christiansen

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on June 20, 2006, I caused to be electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Collins J. Seitz, Jr., Esquire  
Jaclyn Mason, Esquire  
Connolly, Bove, Lodge & Hutz LLP

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# **EXHIBIT 18**

**SEALED DOCUMENT**

# **EXHIBIT 19**

**SEALED DOCUMENT**

# **EXHIBIT 20**

VOLUME: I

PAGES: 1-146

EXHIBITS: 40-52

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

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AMPEX CORPORATION,

Plaintiff,

v.

Civil Action

EASTMAN KODAK COMPANY, ALTEK

No. 04-1373-KAJ

CORPORATION and CHINON

INDUSTRIES, INC.,

Defendants.

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**CERTIFIED COPY**

VIDEOTAPED DEPOSITION of RICHARD J. TAYLOR

April 28, 2006

9:38 a.m.

Ropes & Gray LLP

One International Place

Boston, Massachusetts

Reporter: Michael D. O'Connor, RPR



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RICHARD J. TAYLOR April 28, 2006

02:24:35 1 an isolated pixel-by-pixel basis. But where that  
02:24:45 2 is, I don't know.

02:24:46 3 Q. You agree that the AVA cut and paste  
02:24:48 4 operation was very slow in actuality?

02:24:52 5 MR. SUMMERSGILL: Objection.

02:25:05 6 A. Yes. The process of cutting out an image  
02:25:13 7 or of pasting an image were slow.

02:25:17 8 Q. And particularly, when you also reduced the  
02:25:20 9 size of the cutout before you pasted it caused the  
02:25:25 10 system to slow down in reality?

02:25:28 11 MR. SUMMERSGILL: Objection.

02:25:31 12 A. That is exactly why you would go to all the  
02:25:34 13 lengths you could to get it as fast as possible,  
02:25:37 14 which would not be going for each and every pixel to  
02:25:40 15 and from disk.

02:25:49 16 Q. Do you agree that to generate a  
02:25:51 17 reduced-size image in AVA, you first have to store  
02:25:53 18 it on disk?

02:26:04 19 A. I thought there was testimony to the  
02:26:06 20 contrary. I thought there was testimony that the  
02:26:14 21 image could go directly to the computer store.

02:26:22 22 Q. I believe you're referring to Paragraph  
02:26:24 23 122. If you could turn to that. You say, "Mr.  
02:26:37 24 Gafford argued that the full-sized image was sent

RICHARD J. TAYLOR April 28, 2006

02:26:39 1 from the frame store to the disk before size  
02:26:42 2 reduction." And you cite, "This contradicts the  
02:26:46 3 deposition testimony of Junaid Sheikh, the former  
02:26:48 4 Ampex engineer," et cetera, and you cite transcript  
02:26:51 5 Pages 66 to 68.

02:26:57 6 MR. BEAMER: Let me mark as the next  
02:26:58 7 exhibit a section of the shake transcript, and also  
02:27:12 8 place before you Taylor Exhibit 29, which is the  
02:27:16 9 Sheikh article that Mr. Sheikh is referring to in  
02:27:23 10 the portion of the testimony that you rely on.

11 (Document marked as Exhibit 51  
02:27:30 12 for identification)

02:27:31 13 Q. My question is, where in that transcript  
02:27:33 14 that you cite does it support your statement?

02:29:00 15 I would mention the reason I gave you  
02:29:02 16 Taylor Exhibit 29 is because I see a reference to  
02:29:05 17 Figure 3, which, I think, is Figure 3 of this  
02:29:07 18 article.

02:29:26 19 MR. SUMMERGILL: To the extent you want to  
02:29:27 20 move things along, I don't want to stop Mr. Taylor  
02:29:29 21 from reading whatever he wants to read, but you  
02:29:31 22 might direct him to the cite in his report, because  
02:29:34 23 I think he was starting this exhibit from the  
02:29:35 24 beginning.

RICHARD J. TAYLOR April 28, 2006

02:29:36 1 Q. You cite 66 to 68, and that's what I  
02:29:40 2 assumed you would want to focus on. This happens to  
02:29:50 3 be everything cited in your report from Sheikh.  
02:31:14 4 A. Isn't he saying in 67 that you would make a  
02:31:19 5 copy of it?  
02:31:20 6 Q. Excuse me.  
02:31:21 7 A. Isn't he saying in Line 5 of 67 that you  
02:31:24 8 would make a copy of it?  
02:31:32 9 Q. Isn't he referring to the full-sized image  
02:31:35 10 that in order to generate Figure 3, you have to  
02:31:40 11 first save a copy of the original full-sized image  
02:31:43 12 on disk, and then you perform the various cut and  
02:31:47 13 paste functions?  
02:32:16 14 A. Yes, that could be storing it on disk.  
02:34:10 15 MR. SUMMERSGILL: Is there a question  
02:34:12 16 pending?  
02:34:12 17 MR. BEAMER: I thought there was.  
02:34:15 18 A. I agree with you, that could be to disk.  
02:34:20 19 Q. Is there any other document or testimony  
02:34:21 20 that you rely on for questioning Gafford's statement  
02:34:26 21 about having to store the image on disk before it  
02:34:30 22 was reduced?  
02:35:12 23 A. Sorry, could I just go back to 67. If you  
02:35:16 24 go to Line 13, isn't he there saying that you don't

RICHARD J. TAYLOR April 28, 2006

02:35:24 1 have to necessarily store it to disk?

02:35:28 2 Q. Yes. You don't have to store the

02:35:32 3 full-sized image on disk if you don't care if you

02:35:35 4 ruin the image. If you're going to overwrite the

02:35:41 5 image, then you don't have the original image. So

02:35:44 6 you've got to store it on disk before you perform

02:35:46 7 the rest of the operations. That's what he's

02:35:52 8 saying, isn't he?

02:36:02 9 A. Yes, I agree with you.

02:36:03 10 Q. So is there anything else you're relying on

02:36:07 11 with this statement where you say you disagree with

02:36:11 12 Gafford in 122?

02:36:39 13 A. Certainly the block diagram shows the

02:36:43 14 ability of the frame store to talk directly to the

02:36:46 15 computer.

02:36:50 16 Q. Anything else?

02:36:54 17 A. Not that I can recall at the moment.

02:36:57 18 Q. In Paragraph 117, Page 39, you refer to the

02:37:05 19 size of this random access memory associated with

02:37:09 20 the computer as being 512 kilobytes. Could you turn

02:37:19 21 to this thick manual, Exhibit 50. Do you understand

02:37:22 22 this to be the manual for the computer that you're

02:37:24 23 referring to in Paragraph 117? And could you turn

02:37:50 24 to Page 130 of Exhibit 50.

# **EXHIBIT 21**

**SEALED DOCUMENT**

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I, the undersigned, hereby certify that on June 20, 2006, I caused to be electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

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